

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

**UNITED STATES OF AMERICA,**

Plaintiff,

v.

**COMMONWEALTH OF PUERTO RICO,  
et al.,**

Defendants.

**CIVIL NO.: 12-cv-02039**

**COMMONWEALTH'S INFORMATIVE MOTION ON ECF NO. 2154 AND  
RECOMMENDATIONS TO CONDUCT AUDITS OF REFORM EXPENDITURES**

**MAY IT PLEASE THE COURT:**

**COME NOW**, Codefendants Commonwealth of Puerto Rico and the Puerto Rico Police Bureau ("PRPB"), through the undersigned attorneys, and very respectfully state and pray:

1. On August 31, 2022, this Honorable Court issued Order at ECF No. 2154 ordering that:

no later than September 9, 2022, the Special Master shall provide the Court with the name of an individual or entity he recommends to conduct a thorough audit of the 109 expenditures previously identified as questionable

2. In the Order, the Honorable Court summarizes the discussions of the parties and the Court during the recent August 23, 2022 status hearing regarding the audits and the use of the Puerto Rico Office of the Inspector General ("PROIG"), and concludes that "[T]he Court is not convinced, however, that the PROIG is the appropriate entity to conduct the audit."

Commonwealth's Informative Motion  
Civil No. 12-02039  
Page 2 of 3

3. The Commonwealth respectfully informs the Court that it currently shares the reservations of the Court as to whether the PROIG is the suitable entity to perform the audits.

4. The Commonwealth's position was informed to the parties at the August 30<sup>th</sup> Paragraph 253 meeting. The Commonwealth agreed at the time to send a related correspondence to the parties later that day. See USDOJ September 2, 2022 motion at ECF No. 2156, Exhibit C.

5. The following day this Honorable Court issued the Order at ECF No. 2154, entrusting the Special Master with the pertinent recommendation.

6. Given the reservations stated by the Court with the PROIG, the Commonwealth respectfully proposes that the parties focus on the evaluation of acceptable candidates to all parties to perform the required past and future audits, in order to make recommendations to the Special Master. To that end, the Commonwealth proposes as an alternative the entity EcoVal, headed by attorney Eduardo Soriano. <http://ecoval.us>. It has offices in San Juan, Puerto Rico and Houston, Texas. It is a financial and legal firm. The Commonwealth made initial contact with ECoVal and it stands ready to meet with the parties and/or the Special Master as needed.

7. The Commonwealth is of course open to consider other alternatives proposed by the parties or recommended by the Special Master.

**WHEREFORE**, Defendants Commonwealth of Puerto Rico and the Puerto Rico Police Bureau, respectfully request this Honorable Court take notice of the above.

**RESPECTFULLY SUBMITTED.**

**I HEREBY CERTIFY** that on this same date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

Commonwealth's Informative Motion  
Civil No. 12-02039  
Page 3 of 3

In San Juan, Puerto Rico, this 7th day of September, 2022.

For Defendant COMMONWEALTH OF PUERTO RICO:

**CANCIO, NADAL & RIVERA, L.L.C.**

P.O. Box 364966

San Juan, Puerto Rico 00936-4966

403 Muñoz Rivera Avenue

San Juan, Puerto Rico 00918

Tel. (787) 767-9625

**S/ GABRIEL A. PEÑAGARÍCANO**

USDC PR: 212911

[gpenagaricano@me.com](mailto:gpenagaricano@me.com)

**S/ RAFAEL BARRETO-SOLÁ**

USDC PR: 211801

[rbarreto@cnr.law](mailto:rbarreto@cnr.law)